

Scoping Meeting Questionnaire for the Central Valley Regional Water Board Long-term Irrigated Lands Regulatory Program

Scope and Goals for the Long-term Irrigated Lands Regulatory Program

1. Are there specific issues that should be considered in changing the irrigated lands definition to include only operations where water is applied to produce crops (e.g., greenhouse operations and managed wetlands would no longer be included)?

The inputs and potential threats to water quality of these systems should be considered. The efficiency of the program as a whole should be evaluated as compared to a separate program for greenhouse operations and/or managed wetlands.

2. What issues should be considered in expanding the irrigated lands regulatory program to include regulation of waste discharged to groundwater in addition to surface water?

It is important to consider the many resources that already exist to address groundwater quality, especially those of the State Water Quality Control Board and Department of Pesticide Regulation. This infrastructure and data should be used before a regulatory process is initiated. Identifying the need for further monitoring based on current monitoring would be key. The cost for individuals to conduct groundwater monitoring is astronomical, so care should be taken to identify geographic areas or constituents of concern before applying a general groundwater requirement.

3. The long-term irrigated lands regulatory program may allow degradation of ground and surface waters up to Basin Plan objectives (e.g., bacterial, salts, nutrients, pesticides, etc.) which would still protect beneficial uses. Are there specific waters or geographic areas where such potential degradation should be prohibited?

Every situation is different and site-specific, but the general goal remains the same- to protect beneficial uses. Background levels of some water quality constituents change and flexibility for this variation should remain.

4. What types of management practices or potential mitigation measures should be considered when evaluating how to protect ground and surface waters?

Utilization of best management practices to protect water quality should be identified and rewarded. These practices are well defined by the Natural Resources Conservation Service (NRCS). Educational programs should be utilized to encourage such practices.

Alternative Approaches for Achieving Program Goals

5. What type of categories, if any, should be considered for grouping agricultural operations for similar regulatory requirements (e.g., geography, climate, commodity, soil type, operations, threat to water quality)?

Impaired waters ("threat to water quality") should be top priority. Grouping of agricultural operations by commodity is also logical.

6. Are there specific regulatory tools (e.g. waivers of waste discharge requirements, waste discharge requirements) that should (or should not) be used and why?

The dairy industry has experienced first-hand how frustrating and confusing waste discharge requirements are. In the dairy program, the time and financial burden on producers has been astronomical. The current irrigated lands program- watershed/sub-watershed scale- gives coalitions the opportunity to identify problems and solutions, rather than placing the burdens of monitoring and reporting on individual dischargers.

**Factors that will be Considered in Developing and
Evaluating Program Alternatives**

7. What potential negative environmental impacts may occur due to further efforts to protect ground or surface water quality?

Loss of habitat for animals and plants that depend on flows from discharge could be a major concern. Riparian areas that provide such habitat could be lost if discharges are prohibited.

8. Are there any specific costs/economic concerns that should be addressed during development of the long-term irrigated lands regulatory program?

The need to develop new infrastructure to comply with the program should be a primary concern. Monitoring and reporting costs should also be considered. The cost to monitor water quality, especially for pathogen indicators, is significant.

The loss of agricultural operations caused by such economic burdens negatively affects the entire region's economy.

9. What should be considered to ensure that the long-term irrigated lands regulatory program is implemented in a manner that is cost effective for the State and agricultural community?

Cooperative efforts should be utilized to determine what specific problems exist and these problems should be the focus of regulation. Educational efforts should be considered before regulation is used.

10. What factors should be considered to ensure that the long-term irrigated lands regulatory program is fair?

Agricultural operators who are already using or implementing best management practices to protect water quality should be rewarded for their efforts. Known problems should be addressed most aggressively.

11. What can be done to ensure that the long-term irrigated lands regulatory program is effective at protecting water quality?

Continued watershed scale analyses are important to determine the effectiveness of the program. Many non-agricultural factors including wildlife and suburban inputs should be examined to identify their role. Funding research on these topics would provide answers to this question while advancing science.

12. Are there any additional factors that should be considered in developing and evaluating irrigated lands regulatory program alternatives?

Focusing efforts on educating agricultural operators about the importance of water quality and supporting research to identify problems and solutions are more efficient ways to use limited government funds than creating paper trails and unnecessary burdens on agricultural producers.

Participation/Information

13. How would you like to be kept informed of the development of the long-term irrigated lands regulatory program?

Email notifications and announcements in Coalition newsletters.

14. How would you like to participate in the development of the long-term irrigated lands regulatory program?

The University of California should be used as a resource. Giving UC the opportunity to participate in the development of this program is encouraged.

15. Is there any information that was not provided that you would like to have about the long-term irrigated lands regulatory program?

Not at this time.

Submitted by:
Betsy Karle
Dairy Program Representative
University of California Cooperative Extension
Glenn & Tehama Counties

Long-term Irrigated Lands Regulatory Program Questionnaire

You may submit this questionnaire to the Central Valley Regional Water Board by emailing it to awlaputz@waterboards.ca.gov, or by mailing it to the following address:

California Regional Water Quality Control Board
Central Valley Region
ATTN: Adam Laputz
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

For more information regarding the long-term irrigated lands regulatory program, you may contact Adam Laputz at (916) 464-4848 or by email at awlaputz@waterboards.ca.gov.